

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	MDL No. 2327
THIS DOCUMENT RELATES TO ALL CASES	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

**PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME
FOR FILING DAUBERT MOTIONS REGARDING DR. BRIAN FLYNN**

The Plaintiffs, through their lead counsel, respectfully move this Court for an order granting a 14-day extension of time to file *Daubert* motions regarding Dr. Brian Flynn. This request is Plaintiffs' first request for an extension of time for this deadline.

Counsel for Defendants have stated that they do not oppose the requested extension. This extension is not sought for reason of delay or for any other improper purpose. The extension is needed because depositions of this expert witness have been delayed by scheduling conflicts and adverse weather conditions, which required rescheduling of one day of scheduled depositions of this witness.

WHEREFORE, Plaintiff requests that the Court grant the requested 14-day extension, moving the due date for Plaintiffs' *Daubert* Motions regarding Dr. Brian Flynn to **May 5, 2016**, moving the Response deadline to **May 23, 2016**, and the Reply deadline to **May 30, 2016**.

/s/ Joseph J. Zonies

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CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing motion on April 8, 2016, using the Court's CM/ECF filing system, thereby sending notice of said filing to all counsel.

/s/ Sarah Peasley
Sarah Peasley